

## **AFFIDAVIT IN SUPPORT OF APPLICATION FOR SEARCH WARRANT**

I, Ryan P. Griffin, being sworn, state:

### **Introduction and Agent Background**

1. I am a Special Agent with the federal Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”). I have been employed as an ATF Special Agent since 2017. As an ATF Special Agent, my duties include the investigation of violations of laws related to firearms trafficking, firearm possession by prohibited persons, and the use of firearms in drug trafficking crimes. I am a graduate of the ATF National Academy and of the Federal Law Enforcement Training Center. I possess a Juris Doctor from Suffolk University Law School, as well as an undergraduate degree in Criminal Justice. I am currently assigned to Group VI in the Boston Field Division of the ATF. This group works with other federal, state, and local police departments north of the City of Boston to investigate and prosecute violations of the federal firearms, explosives, and controlled substance laws. Prior to my employment with ATF, I was employed as a Federal Air Marshal with the U.S. Department of Homeland Security for approximately 9 years; and as a Patrolman with the Groton (Massachusetts) Police Department for approximately 4 years. I am also a veteran of Operation Inherent Resolve (Iraq) and a recipient of the Bronze Star.

### **Purpose of the Affidavit**

2. I make this affidavit in support of applications for search warrants under Federal Rule of Criminal Procedure 41 for the premises of 12 Murphy Drive, Suites 100, 200, and 201, Nashua, New Hampshire (“Target Location 1”); and a white 2011 International Box truck, New Hampshire Registration 5285117, Vehicle Identification Number 1HTMMAAL2BH316849, registered to Xiaozhong ZHANG with a registered address of 4 Apple Tree Green, Nashua, New Hampshire (“Target Location 2”) (collectively the “Target Locations”). A complete description

of Target Location 1 is set forth in Attachment A-1; and a complete description of Target Location 2 is set forth in Attachment A-2. Attachments A-1 and A-2 are attached hereto and incorporated herein.

3. I believe that the Target Location 1 is the business locations, and that Target Location 2 is an instrumentality of, active National Firearms Act (“NFA”) firearms traffickers and the Target Locations contain evidence of firearms trafficking; specifically, the manufacture, storage, and subsequent transfer of firearm silencers that are not serialized, not registered in the National Firearm Registry and Transfer Record (“NFRTR”), and do not contain NFA markings as required by Title 26 of the United States Code. As a result, I submit that there is probable cause to believe that the Target Locations contain records and other evidence of the following offenses: (a) engaging in the business of manufacturing without having paid special occupational tax, in violation of 26 U.S.C. § 5861(a); (b) possession of a firearm which is not registered in the NFRTR, in violation of 26 U.S.C. § 5861(d); (c) transferring a firearm in violation of the provisions of Title 26 of the United State Code, in violation of 26 U.S.C. § 5861(e); (d) making of a firearm in violation of the provisions of Title 26 of the United States Code, in violation of 26 U.S.C. § 5861(f); and conspiracy to violate the National Firearms Act, in violation of 18 U.S.C. § 371 (collectively, “the Target Offenses”).

4. I am seeking these search warrants in furtherance of an ongoing criminal investigation into the activities of Xiaozhong ZHANG (“ZHANG”) and Wei “Crystal” WANG (“WANG”), doing business as “Lethal Eye” (“Lethal Eye”), which is a business that sells firearm parts and firearm silencers online, distributing them nationwide via U.S. Postal Service out of the Target Location(s).

5. As discussed further below, there is also probable cause to believe that the Target Locations contain evidence, fruits, and instrumentalities of the crimes identified above, as described in Attachment B.

6. I have personally participated in this investigation since at least January of 2023. I am familiar with the facts and circumstances of this investigation based upon: (a) my personal knowledge and involvement in this investigation; (b) my review of records related to this investigation; (c) information provided to me orally and in writing by other law enforcement agencies; and (d) my experience and training as a criminal investigator. Because this affidavit is submitted for the limited purpose of establishing probable cause that evidence of criminal activity involving the Target Offenses is located at the Target Locations, I have not included each and every fact known to me or other law enforcement officers involved in this investigation. Rather, I have included only those facts that I believe are sufficient to establish probable cause for the issuance of the requested search warrants. All times herein are approximate.

### **Probable Cause**

#### **I. Investigation Background**

7. In October 2022, members of the Drug Enforcement Administration (“DEA”) Boston Tactical Diversion Squad began an investigation into an individual named Jason LEBBERES (“LEBBERES”).

8. LEBBERES was identified as a potential source of supply for firearms and counterfeit pills based upon interactions with a confidential source. Investigators purchased controlled substances, privately manufactured firearms, and a machine gun conversion device, also known as a “Glock Switch,” from LEBBERES through the confidential source between October of 2022 and February of 2023. The confidential source had provided LEBBERES with a name

and address for a post office box (the “UC Drop Box”) to which LEBBERES sent the controlled substances and firearms. Unbeknownst to LEBBERES, law enforcement officers control this post office box.<sup>1</sup>

9. In January of 2023, at the request of investigators, the confidential source purchased a “Privately Manufactured Firearm” (“PMF”) from LEBBERES. On January 24, 2023, investigators recovered the PMF from the UC Drop Box. As investigators opened and reviewed the contents of several packages containing the PMF parts and ammunition sent by LEBBERES, investigators observed that the slide assembly of the PMF was wrapped inside an envelope from a previous mailing. The return address of the envelope from the previous mailing was visible and read: “Crystal Wang 17E Clinton Dr. Hollis, NH 03049”. The recipient address had been removed prior to being used to wrap the slide assembly. US Postal (“USPIS”) Inspector Andrew Yanchus was able to retrieve the recipient information using the tracking number and confirmed that the mailing recipient was LEBBERES.




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<sup>1</sup> The UC Drop Box is located in Boston, Massachusetts.

10. LEBBERES was arrested on federal firearms and narcotics charges on March 1, 2023. *See United States v. Jason Lebbes*, 23-10046-PBS (D. Mass.). A federal search warrant was executed on the same date at his residence in Tuckahoe, New York. During the execution of the search warrant, various quantities of narcotics and over twenty firearms were recovered, including numerous machine gun conversion devices and firearm silencers.

11. Following the arrest of LEBBERES, investigators began looking into LEBBERES's sources of supply, as LEBBERES was in possession of numerous unregistered suspected NFA firearms. A previous internet search of 17E Clinton Drive, Hollis, New Hampshire had revealed several websites listing their physical locations 17E Clinton Drive, Hollis, New Hampshire; among them was that of "Lethal Eye." According to Lethal Eye's website ([www.lethaleye.com](http://www.lethaleye.com)), Lethal Eye is "an innovative fire arm[sic] accessory company who is dedicated to producing high-quality products." Lethal Eye's website lists their address as 17E Clinton Drive, Hollis, New Hampshire 03049 (together with an adjacent parcel, 17F Clinton Drive, Hollis, New Hampshire 03049, this address is referred to hereinafter as the "Hollis Location").

12. The Hollis Location is a commercial building located within a strip mall.

13. A review of [www.lethaleye.com](http://www.lethaleye.com) revealed advertisements for firearm parts that included adapters, muzzle breaks, slide lock levels, and trigger connectors. Investigators located a video on the website that displayed and audibly explained how to use the advertised adapters to

attach automotive oil filters / solvent traps to the barrel of a pistol.<sup>2</sup> Investigators also noticed that while automotive oil filters did not appear available for sale on the website, they could be found for sale after utilizing the “search” function on the website by typing one of several individual letters that included “A,” “D” and “F.”<sup>3</sup>

14. Investigators noted that several “muzzle breaks” advertised for sale appeared to be firearm silencers, given their length and design.<sup>4</sup> Every webpage on the Lethal Eye website included a disclaimer that contained but was not limited to the following statements:

All products are designed and sold with 100% COMPLETE COMPLIANCE AND COOPERATION for and with BATFE [ATF] and NFA rules and regulations.

BUYER UNDERSTANDS THAT THESE ARE NOT SUPPRESSORS AND OR SILENCERS IN ANY WAY SHAPE OR FORM.

15. Based on my training and experience, this disclaimer was included in an attempt to insulate Lethal Eye from criminal liability and was not in fact accurate. An internet search of 17E Clinton Drive, Hollis, New Hampshire also indicated that a company called KBC Capital LLC was located at this address. A query of State of New Hampshire Department of State records

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<sup>2</sup> A solvent trap or automotive oil filter attached to the end of a firearm barrel will function as a firearm silencer / suppressor if the firearm is fired and will continue to do so with subsequent firings.

<sup>3</sup> A solvent trap or automotive oil filter attached to a firearm is not considered a firearm silencer / suppressor until a hole is created on the bottom of the filter by drilling or firing the firearm once attached. It is NOT common practice to attach solvent traps or automotive oil filters to firearms for any legal purpose (e.g., firearm cleaning).

<sup>4</sup> Most commercially available muzzle breaks are typically no longer than 2 to 3 inches, as additional length does not add to their intended function of reducing recoil and muzzle rise. The items advertised by Lethal Eye (“M-079”, “M-074”, and “M-099”) appeared to have “baffles” (which are integral parts of a silencer) similar to a firearm silencer / suppressor.

showed that KBC Capital LLC maintains a business address of 17E Clinton Drive, Hollis, New Hampshire 03049. The same query showed that the registered agent for KBC Capital LLC is ZHANG. Internet records showed 17F Clinton Drive, Hollis, New Hampshire as being associated with KBC Capital LLC as well. New Hampshire Division of Motor Vehicle (“DMV”) records show that ZHANG has a residential address of 4 Apple Tree Green in Nashua, New Hampshire.

16. An advertisement for lease of 17 Clinton Drive, Hollis, New Hampshire references both units (17E Clinton Drive, Hollis, NH and 17F Clinton Drive, Hollis, NH) as unit “EF” or “E/F,” and a schematic attached to the lease site shows that the units are connected inside the building. The lease advertisement showed that unit 17 “EF” would be available for lease in August of 2023.

## **II. Lethal Eye Conducted Business at the Hollis Location**

17. Through my involvement in this investigation, I understand that Lethal Eye conducted business at the Hollis Location until approximately July 31, 2023. I have reached this conclusion based on several facts:

- a. First, the company website ([www.lethaleye.com](http://www.lethaleye.com)) lists 17E Clinton Drive, Hollis, New Hampshire 03049 as its company address and (603) 716-5153 as its phone number. The phone number is also associated with KBC Capital LLC and was also the number posted on leasing signs at this location.
- b. Second, as further described below, investigators conducted controlled purchases of firearm silencers and other items from [www.lethaleye.com](http://www.lethaleye.com) on May 19, 2023, and June 5, 2023. Upon receipt of these items, investigators

observed that the return address on the package labels was “17E Clinton Dr. Hollis, NH 03049.” These packages were received at the UC Drop Box.

- c. Third, as described further below, investigators, as recently as July 31, 2023, observed and photographed mail leaving the Hollis Location since July 5, 2023. In doing so, they have located individual packages containing additional items that were purchased online by investigators from [www.lethaleye.com](http://www.lethaleye.com) on July 4, 2023. Investigators also noted that the packages’ labels contained handwritten notations of item numbers that are correlated with items available for purchase on [www.lethaleye.com](http://www.lethaleye.com). The labels listed “17E Clinton Dr. Hollis, NH” as the return address.
- d. Fourth, most outgoing packages reviewed between July 5, 2023 and July 31, 2023, contained “17E Clinton Dr. Hollis, NH” as the return address, but with varying sender names that include “Lethal Eye,” “KBC Capital LLC,” “Xiaozhong Zhang,” “AceCrew,” “Coppermine,” and “Crystal Wang.” On several packages where the sender was listed as “Lethal Eye,” “KBC Capital LLC,” “Xiaozhong Zhang,” and “Crystal Wang,” the labels had handwritten item numbers that are correlated with item numbers for various products listed for sale on [www.lethaleye.com](http://www.lethaleye.com).
- e. Fifth, as described further below, investigators have conducted numerous internet searches regarding the websites and people associated with the Hollis Location. ZHANG and WANG share a residential address (4 Apple Tree Green, Nashua, New Hampshire). Numerous internet and social media searches have revealed that Wei WANG also uses the first name of

“Crystal.” “Crystal Wang” and “17E Clinton Dr. Hollis, NH 03049” were listed as the return address found on the envelope that was used to wrap the slide assembly of the PMF sent to the UC Drop Box by LEBBERES in January 2023.

- f. Sixth, as described further below, investigators conducted surveillance at the Hollis Location and observed vehicles registered to WANG prior to July 31, 2023. Investigators have also identified WANG and ZHANG at the Hollis Location, comparing observations to DMV photos and social media accounts.

18. On varying dates beginning late June through August of 2023, investigators conducted surveillance at the Hollis Location. During this surveillance, investigators learned several facts concerning the business of Lethal Eye and its affiliates:

- a. First, investigators repeatedly observed two vehicles registered to WANG (a 2016 Porsche Cayenne and a 2017 Ford F-150) in front of the Hollis Location.
- b. Second, investigators observed a third individual identified as Paul DUCLOS (“DUCLOS”) entering and exiting the Hollis Location. Investigators identified DUCLOS by comparing the individual investigators observed with DUCLOS’s driver’s license photograph. Social media searches indicated that DUCLOS is an employee of KBC Capital LLC. A white Toyota Corolla with a New Hampshire registration of 4358165 is registered out of DUCLOS’s residential address has been observed numerous times parked in front of the Hollis Location. Based on my review

of records from the New Hampshire DMV, I understand that this car is registered to DUCLOS's wife.

- c. Third, prior to July 31, 2023, investigators observed WANG and ZHANG walking in and out of both 17E and 17F Clinton Drive, Hollis, NH. Investigators observed both WANG and ZHANG moving between units 17E and 17F on the inside (through transparent windows), demonstrating that the units are connected.

19. As of August 1, 2023, the Hollis Location appears to be vacated, with signage for KBC Capital still visible on the building and entrance to the parking lot. However, as of August 14, 2023, [www.lethaleye.com](http://www.lethaleye.com) and [www.acecrewdirect.com](http://www.acecrewdirect.com) still list their respective business addresses as 17E Clinton Drive, Hollis, New Hampshire.

### **III. Lethal Eye Now Conducts Business at Target Location 1.**

20. In early July of 2023, an internet search of ZHANG indicated that ZHANG had created an additional limited liability company called "Zhang Holdings" on January 9, 2023. The address for Zhang Holdings is listed by the New Hampshire Department of State as 12 Murphy Drive, Suite 100, Nashua, New Hampshire.

21. Based on my review of property records, I understand that Unit 5 is a collection of office suites located at 12 Murphy Drive, and that Suites 100, 200, and 201 are located within Unit 5. These office suites operate under the trade name Everett Executive Suites. Collectively, these three office suites are "Target Location 1."

22. On or about July 13, 2023, investigators observed Target Location 2, a white box truck, Vehicle Identification Number (VIN) 1HTMMAAL2BH316849 with an expired Massachusetts commercial registration (T64681), parked at the loading dock at 12 Murphy Drive,

Nashua, NH. On July 18, 2023, I observed a white box truck with a New Hampshire registration (5285117) parked in front of the Hollis Location. A query of the license plate revealed that the vehicle was recently registered on July 14, 2023, to ZHANG out of his residential address of 4 Apple Tree Green in Nashua, New Hampshire. The query also revealed the same VIN as the box truck that investigators observed on July 13, 2023, at 12 Murphy Drive. This box truck is Target Location 2.

23. On subsequent dates since July 18, 2023, investigators have observed Target Location 2 (the box truck), operated by DUCLOS, in transit between the Hollis Location and the loading docks at 12 Murphy Drive, which are immediately adjacent to Unit 5, within which Target Location is located. On July 24, 2023, I personally observed DUCLOS loading the aforementioned box truck with a forklift in the back of the Hollis Location, then observed DUCLOS drive the box truck to the loading docks at 12 Murphy Drive. Investigators have also observed the Ford F-150 registered to WANG, the Porsche Cayenne registered to WANG, and the Toyota Corolla used by DUCLOS parked at 12 Murphy Drive beginning in July 2023 and most recently on August 15, 2023. Based on these observations, I believe that Lethal Eye has largely moved its operations from the Hollis Location to 12 Murphy Drive.

24. On July 19, 2023, I discovered an online advertisement from Zhang Holdings, which showed several suites (101, 102, 103, 114) within 12 Murphy Drive (which, again, is a series of office suites) available for lease. A subsequent review of land records from the Hillsborough County Register of Deeds showed that on March 23, 2023, Zhang Holdings purchased “Unit 5” within 12 Murphy Drive. (Book 9689, Page 2339). A review of the associated plan (Plan 41739) shows that “Unit 5” is the south corner of the building at 12 Murphy Drive, Nashua, New Hampshire. Comparing Plan 41739 to surveillance observations, Target Location 1

is contained within the “Everett Executive Suites” area where investigators have observed the Ford F-150 registered to WANG and the Toyota Corolla attributed to DUCLOS parked on various dates. Unit 5 appears to extend to the loading docks on the southeast of 12 Murphy Drive, Nashua, NH. Unit 5 extends to the north to Unit 3, which is occupied by Elks Lodge No. 720 of Nashua, NH. The only part of Unit 5 that investigators know to be leased at this time is a small barber shop investigators have observed operating within Unit 5.<sup>5</sup>

25. On or about July 22, 2023, investigators learned from postal records that “Crystal Wang” had submitted a forwarding address with the US Postal Service for KBC Capital LLC, forwarding from 17E Clinton Drive, Hollis, NH to 12 Murphy Drive, Suite 200, Nashua, NH on July 21, 2023.

26. Since that date, investigators have reviewed mail from either AceCrew, Coppermine, Crystal Wang, Lethal Eye, KBC Capital LLC, and/or Xiaozhong Zhang. Investigators reviewed outgoing mail from these entities/individuals with a return address of Suite 200 or Suite 201 which are within “Target Location 1.” Some of this mail bears Lethal Eye part numbers. . For these reasons, I believe there is probable cause to search each of the office suites that comprise Target Location 1.

#### **IV. ZHANG and WANG (d/b/a Lethal Eye) are Engaged in Criminal Conduct**

##### *A. Purchase and Delivery of unregistered NFA Suppressors*

27. As discussed above, on May 19, 2023, and June 5, 2023, investigators purchased suspected suppressors and additional firearm parts from [www.lethaleye.com](http://www.lethaleye.com). The items purchased

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<sup>5</sup> Because the barber shop is not located within Suites 100, 200, or 201, I do not request authorization to search the barber shop.

on May 19, 2023, were a “½ - 28 Quad Thread Oil Filter Solvent Trap Adapter” (Item M-048) and a “½ - 28 Pitch 18 Port Gilled Muzzle Break Recoil Reducer Combo” (Item M-074 combo). On June 1, 2023, the package containing the items was retrieved by investigators at the UC Drop Box. The package label included the address for the Hollis Location on its label as the return address. The handwritten text “1 x M-074 combo” and “1 x M-048,” were visible at the bottom of the label. The items purchased on June 5, 2023, were two (2) “Muzzle Break .308 5/8-24 TPI 6 Inch Length 7075 Aluminum Precision Recoils” (Item M-099 / M-095). On June 21, 2023, the package containing the items was retrieved by investigators at the UC Drop Box. The package label contained 17E Clinton Drive, Hollis, New Hampshire as the return address on the label, with “2 x M-099” handwritten on the bottom of the label.



28. On June 22, 2023, investigators sent all items purchased from Lethal Eye to the Firearms Technology Criminal Branch (“FTCB”) within ATF for analysis and classification. On June 27, 2023, I contacted ATF FTCB Firearms Enforcement Officer (“FEO”) John Hawes regarding the items. FEO Hawes subsequently advised me that Lethal Eye item M-074 (ATF

Exhibit #150), and item M-099 (ATF Exhibits #151 and #152) were classified as firearm silencers. As such, these items are subject to the provisions of the NFA and require registration upon manufacture and any subsequent transfer in the NFRTR in accordance with 26 U.S.C. § 5861.

29. On July 5, 2023, I received certification from ATF's NFA Division – Government Support Branch that WANG, ZHANG and DUCLOS had no NFRTR applications to transfer or register any of the firearm silencers purchased by investigators from Lethal Eye.

30. On July 10, 2023, ATF FTCB forwarded the approved final report on ATF Exhibits #150, #151, and #152. ATF FTCB declared the following: (1) that ATF Exhibits #150, #151, and #152 are “firearms” as defined in 18 U.S.C. § 921(a)(3)(C); (2) that ATF Exhibits #150, #151, and #152 are “firearm silencers” as defined in 18 U.S.C. § 921(a)(24); and (3) that ATF Exhibits #150, #151, and #152 are “firearms” as described in 26 U.S.C. § 5845(a). ATF FTCB also noted that ATF Exhibits #150, #151, and #152” do not contain NFA manufacturer or maker's marks of identification or serial numbers as required by 26 U.S.C. § 5842.

31. On July 11, 2023, I received certification from ATF's Federal Firearms Licensing Center (ATF FFLC) that WANG, ZHANG and DUCLOS are not Federal Firearm Licensees (FFL). Therefore, they are not a licensed importers, licensed manufacturers, or licensed dealers, as those terms are defined in 18 U.S.C. § 921. I have also learned that there is no record of an FFL for 17 Clinton Drive Hollis, NH or Target Location 1, nor Special Occupational Tax (SOT) payer status. In sum, I believe Lethal Eye manufactured and/or transferred NFA weapons in violation of federal law.

B. *Bulk Purchase of Additional Firearm Silencers in Violation of the NFA.*

32. In May of 2023, USPIS created an email account (hereinafter, the “source account”) from which to purchase items as well as communicate with Lethal Eye. This email account has been the listed account on all purchases and used for all email communications with Lethal Eye.

33. On July 18, 2023, at the direction of investigators, a confidential source (the “CS”)<sup>6</sup> attempted to contact both phone numbers ((800) 232-5158 and (603) 716-5153) listed on the website [www.lethaleye.com](http://www.lethaleye.com). There was no answer at either number, and both numbers had same generic automated message after several rings. The CS wrote an email that he/she sent to “[info@lethaleye.com](mailto:info@lethaleye.com)” from the source account. (This email address is listed on [www.lethaleye.com](http://www.lethaleye.com) under “contact info” and is also listed below the phone number of “6037165153” when the “menu” function is utilized). In the email, which was reviewed by investigators, the CS requested a bulk order of the “M-099” items and requested a discount. The CS requested to pick the items up and pay cash. The CS also requested to speak with someone from Lethal Eye regarding the deal.

34. Several hours later, a response was sent from “Crystal Wang” ([train-rain@hotmail.com](mailto:train-rain@hotmail.com)) asking how many “M-099s” the CS was looking for. The bottom of the email read “Best regards, Marisol”.

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<sup>6</sup> The CS was arrested for bank fraud and NFA related offenses in January 2021. He subsequently pleaded guilty and was sentenced for the related conduct. Since the CS’s arrest, the CS has served as a confidential source of information for several investigations for Homeland Security Investigations (“HSI”). Based on the CS’s work with HSI, I believe that the CS is reliable.

35. As email negotiation continued over the next several days, “Marisol” offered a price of \$1,394.87 for fifteen (15) of the “M-099s” but advised that local pick up was not available, instead offering to ship anywhere in the United States. In a subsequent email, “Marisol” sent to the CS on July 24, 2023, the CS was given the option to pay by check or receive an electronic invoice.

36. At the direction of investigators, the CS requested the invoice, which the CS received via email on July 27, 2023. Following receipt of the invoice, the CS advised LethalEye that the invoice was not functioning properly, requested a name and shipping address for a money order. On July 31, 2023, “Crystal Wang” responded to make the “check” payable to “KBC Capital LLC” at “12 Murphy Dr. Suite 200, Nashua, New Hampshire.” I understand that Suite 200 is an office suite located within Target Location 1.

37. On July 31, 2023, investigators sent (2) US Postal Money Orders (one for \$1,000.00 USD and the other for \$394.87 USD) via overnight US Mail to KBC Capital LLC at 12 Murphy Drive, Suite 200, Nashua, New Hampshire. Records from the Federal Reserve show that that the money orders were negotiated at a TD Bank ATM 10 Gusabel Avenue, Nashua, New Hampshire.

38. The requested “M-099s” were shipped to the UC Drop Box and recovered on August 7, 2023. The package label showed the sender as “KBC Capital LLC” and contained writing at the bottom of the label showing “15 x M-099.” The label listed 17E Clinton Dr. Hollis,

NH as the return address. As set forth above, M-099s previously received from Lethal Eye were declared firearm silencers by ATF FTCB.



39. On August 7, 2023, the CS made contact with Lethal Eye via phone and spoke with a female who identified herself as “Marisol.” The CS requested a bulk order of 50 to 100 M-099s and asked for a larger discount. Marisol stated she would need to speak to the owners. The CS stated he/she would call back on August 11, 2023 to follow-up.

40. On August 11, 2023, the CS again made contact with “Marisol.” “Marisol” indicated she had spoken to her female boss (whom I understand based on the facts set forth herein to be WANG), who agreed to a discount of approximately \$700 for the entire order. “Marisol” indicated Lethal Eye had 58 M-099s in stock. The CS asked whether Lethal Eye would sell him/her Glock switches. “Marisol” indicated that she would need to contact Lethal Eye’s supplier to

determine the answer to this question. A Glock switch is a machinegun conversion device that qualifies as a “machinegun” under 18 U.S.C. § 922(o).

**V. WANG and ZHANG Are Using the Target Locations in Furtherance of the Target Offenses**

*A. Solicitation and Delivery of Firearm Silencers / Trafficking in NFA Firearms*

41. Items such as ATF Exhibits #150, #151, and #152 and similar items continue to be available for purchase on [www.lethaleye.com](http://www.lethaleye.com). While observing and photographing outgoing mail from the Hollis Location on July 11, 2023, I observed and photographed a package that listed the sender as “Crystal Wang” with a return address of “17E Clinton Dr. Hollis, NH 03049-6595.” The package was addressed to a recipient in Medley, Florida and contained a handwritten item number of “M-079.” A query of the item number from [www.lethaleye.com](http://www.lethaleye.com) shows that “M-079” is a “5/8-24 Pitch 18 Port Gilled Muzzle Break Recoil Reducer.” This item appears remarkably similar to item “M-074” the “½ - 28 Pitch 18 Port Gilled Muzzle Break Recoil Reducer,” which has been declared a firearm silencer by ATF FTCB and contains a Monolithic Baffle Core described in the FTCB report. Manual manipulation of the enclosed device through the envelope confirmed a design consistent with the picture of the “M-079” from the website.



42. Additional observations of “M-079” and an item with no handwritten item number, but similar in feel to M-079 or M-074 have been in the outgoing mail from 17E/F Clinton Dr. Hollis, NH since July 11, 2023.<sup>7</sup> From July 11, 2023, to July 28, 2023, investigators have noted at least four (4) “M-079s” that have been shipped from the Hollis Location to locations throughout the United States.

43. On July 18, 2023, I contacted ATF’s Firearms & Ammunition Technology Division (ATF FATD) to inquire if anyone associated with [www.lethaleye.com](http://www.lethaleye.com), KBC Capital LLC, New Angle LLC, WANG, ZHANG or DUCLOS had ever contacted ATF FATD to have any of the items that they sell tested for compliance with the National Firearms Act to support the aforementioned claims/disclaimer on [www.lethaleye.com](http://www.lethaleye.com). Firearms Enforcement Officer

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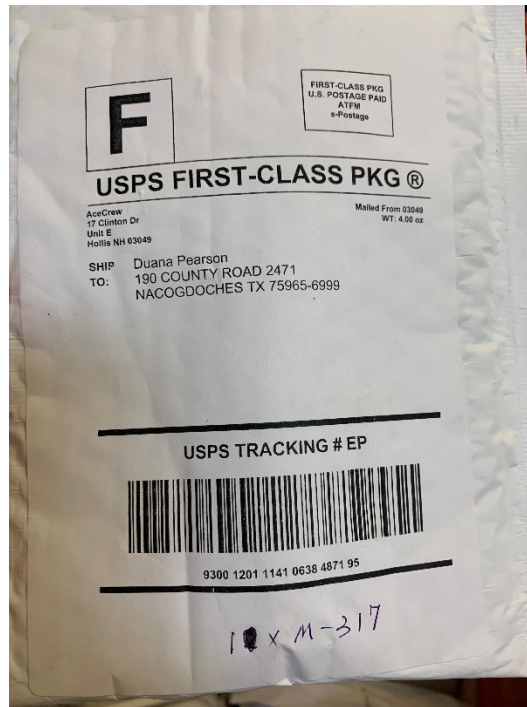
<sup>7</sup> I determined through manual manipulation of the envelope containing the item that Items M-074 and M-079 are of similar length and design.

(“FEO”) Anthony Ciravolo from ATF FATD responded that he found no correspondence with any of the above-mentioned individuals or entities.

44. As of July 31, 2023, investigators have been observing and photographing mail associated with KBC Capital LLC, WANG and ZHANG that has been collected from each of the office suites that comprise Target Location 1. Investigators have observed packages bearing senders “KBC Capital LLC,” “Crystal Wang” and Xiazhong Zhang,” with return addresses of both 12 Murphy Drive, Nashua, NH and 17E Clinton Dr. Hollis, NH. Investigators have also observed Lethal Eye items “M-079” and “M-074” in the outgoing mail from 12 Murphy Drive, Nashua, New Hampshire since this date.

45. Also in the mail received from Target Location 1, investigators have observed labels containing sender information “Crystal Wang” with a return address of 12 Murphy Drive, Suite 201. Nashua, NH with item numbers written at the bottom of the label corresponding with part numbers from [www.lethaleye.com](http://www.lethaleye.com). Investigators also observed other labels on other packages listing the sender as “Xiaozhong Zhang” with an address of 12 Murphy Dr., Suite 200, Nashua, NH and [www.lethaleye.com](http://www.lethaleye.com) associated part numbers.

46. On August 7, 2023, investigators reviewed a package at the Hudson, New Hampshire Post Office having been mailed out of 12 Murphy Drive, Nashua, New Hampshire labeled as having been sent by “AceCrew” with a return address of 17E Clinton Dr. Hollis, NH. The parcel contained a handwritten notation of “1xM-317.” A search of both [www.lethaleye.com](http://www.lethaleye.com) and [www.acecrewdirect.com](http://www.acecrewdirect.com) for this item number yielded no results. By manual manipulation of the package, the item appeared to be approximately 6 inches long and felt like a smooth cylinder, consistent with a firearm silencer or a silencer part. Such items are NFA weapons.



47. As of August 14, 2023, Target Location 2 (the white 2011 International Box Truck (NH 5285117)) still remains parked outside 12 Murphy Drive. On August 7, 2023, I observed ZHANG in the parking lot of 12 Murphy Drive at the back of the box truck. He then carried materials from the box truck into 12 Murphy Drive, through the “Everett Executive Suites” entrance.

*B. Lethal Eye Likely Maintains Records of Transactions at the Target Location 1*

48. Businesses in the United States generally keep records related to purchases, customers, vendors, orders, inventory, services provided, and employees as part of the normal course of business. These records can include accounts payable, accounts receivable, correspondence, payroll information, inventory information, outstanding debts, bank statements, income, contracts, contact cards, and more. These records make it easier to file taxes, keep inventory levels steady, make sure all payments are received, keep in contact with prior customers,

and make sure all employees and vendors get paid. These records can be in paper form and/or digital formats stored on electronic devices.

## VI. Conclusion

49. As detailed throughout this Affidavit and in this section, WANG and ZHANG are active traffickers in unregistered NFA firearms silencers, WANG and ZHANG conduct business at the Target Location 1 and use Target Location 2 as an instrumentality in furtherance of that business, WANG and ZHANG have used the Target Locations in furtherance of the Target Offenses, and I believe that records, instrumentalities, and evidence of the Target Offenses are likely to be physically located at the Target Locations.

Respectfully submitted,

/s/ Ryan P. Griffin  
Ryan P. Griffin, Special Agent  
U.S. Bureau of Alcohol, Tobacco, Firearms &  
Explosives (ATF)

Sworn to telephonically in accordance with Federal Rule of Criminal Procedure

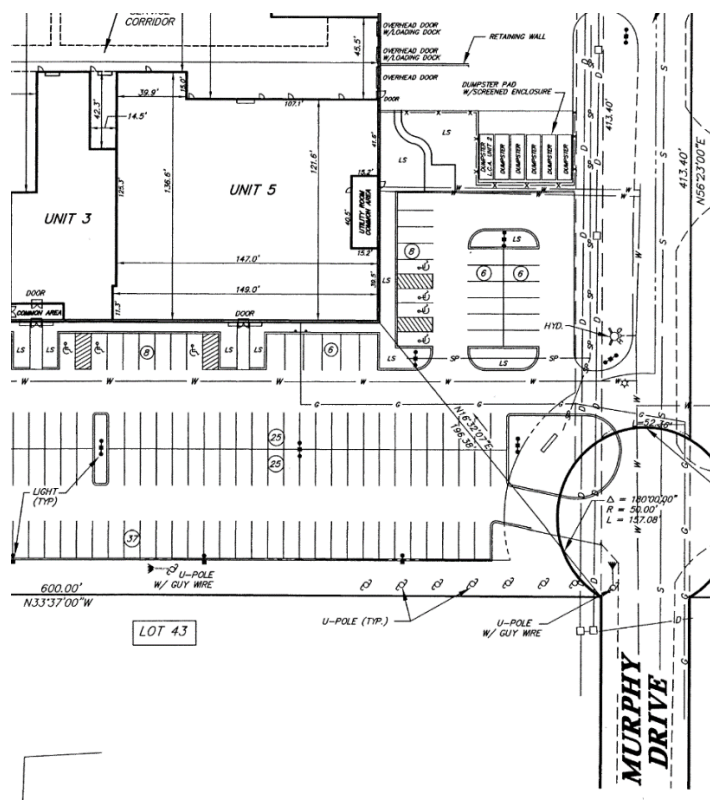
4.1 on August 17, 2023.



Hon. Talesha L. Saint-Marc  
United States Magistrate Judge  
District of New Hampshire

**ATTACHMENT A-1****12 Murphy Drive., Unit 5, Suites 100, 200, and 201**  
**Nashua, New Hampshire ("Target Location 1")**

Target Location 1 is in the southern corner of the building located at 12 Murphy Dr., Nashua, NH. The entrance to this unit is labeled as "Everett Executive Suites." Unit 5 has numerous suites, including Suite 100 (Zhang Holdings LLC), Suite 200 (KBC Capital LLC), and Suite 201. Unit 5 is limited to the north by its border with Unit 3 (Nashua Elks Lodge) and is bordered to the east by the loading docks. The suites contained within Unit 5, including the three office suites that comprise Target Location 1 (100, 200, and 201), are connected by a series of internal hallways. The loading docks are common area for all tenants at 12 Murphy Drive, Nashua, New Hampshire.



**ATTACHMENT A2**

**2011 International Box Truck, white in color, New Hampshire registration 5285117 with a Vehicle Identification Number of 1HTMMAAL2BH316849 (Target Location 2)**



**Attachment B**

**January 1, 2023 (TSM)**

1. All records and evidence, from ~~August 1, 2020~~ to the present, in whatever form, and tangible objects that constitute evidence, fruits, or instrumentalities of violations of 26

U.S.C. § 5861 as described in the following paragraphs are to be seized:

- a. Books, records, receipts, notes, ledgers, letters, and other papers relating to the distribution of NFA firearms, travel for the purpose of acquiring and/or distributing NFA firearms, and to monetary transactions involving the proceeds from the sale of NFA Firearms;
- b. Personal books, papers, and other electronic devices reflecting names, addresses, telephone numbers, and other contact or identification data relating to the distribution of NFA Firearms, money laundering, and the criminal use of communication facilities;
- c. Records relating to the generation of income from the sale of NFA Firearms and the expenditure of such income, including money orders, wire transfers, cashier's checks and receipts, bank statements, passbooks, checkbooks, and check registers, as well as consumer items such as electronic equipment;
- d. Documents and other records indicating travel in interstate and foreign commerce, such as maps, GPS coordinates, navigation coordinates, travel itineraries, plane tickets, boarding passes, motel and hotel receipts, passports and visas, credit card receipts, and telephone bills and related communications;
- e. Cellular telephones, smart phones, electronic tablet devices, and other electronic media utilized for communication, transportation, and data acquisition and retention purposes related to acquiring and distributing NFA Firearms and proceeds, including incoming and outgoing call and text message logs, contact lists, photo and video galleries, sent and received text messages, online searches and sites viewed via the internet, online or electronic communications sent and received (including email, chat, and instant messages), sent and received audio files, navigation, mapping, and GPS files, telephone settings (including contact lists) text messages, and related identifying information such as telephone identification numbers, call forwarding information, messages drafted but not sent, and voice messages;
- f. identification evidence and/or indicia, such as cell phones with particular numbers, mail, deeds, leases, rental agreements, photographs, bills, and identification documents, that tend to identify the person(s) in residence, occupancy, control, or ownership of subject premises and/or subject communication devices;

- g. Firearms, explosives, ammunition, firearm components, firearm accessories, tactical equipment and other items pertaining to the domestic and international trafficking of firearms, including, but not limited to, handguns, pistols, revolvers, rifles, silencers, machine guns, and other weapons, and any records of receipts pertaining to firearms, parts, accessories and ammunition;
- h. Any and all tools reasonably believed to be possessed or used by subject of this investigation in furtherance of manufacturing or modifying firearms; including but not limited to drills, presses, jigs, and cutting tools.
- i. Records and documents showing indicia of occupancy;
- j. Books, records, receipts, bills of lading, notes, ledgers, papers, business records, packaging, and other items relating to the purchase, possession, receipt, transfer, manufacture or distribution of firearms, including, but not limited to, materials, chemicals, tools and literature related to firearms;
- k. Wireless telephones, telephone bills, telephone note pads and notes, contracts and other documents reflecting the ownership, subscription information, and the use of the telephones, reasonably believed to be possessed or used by subject of this investigation in furtherance of the Target Offenses;
- l. Photographs, including still photographs, negatives, video recordings, slides, film, undeveloped film, digital photos and the contents therein, in particular, photographs of co-conspirators, or those relating to purchase, possession, receipt, transfer, manufacture or distribution of firearms;
- m. Contact information relating to suppliers, manufacturers and purchasers involved in the purchase, possession, receipt, transportation, transfer, manufacture or distribution of firearms;
- n. Correspondence pertaining to the purchase, possession, receipt, transfer, manufacture or distribution of firearms, whether transmitted or received using a computer, wireless telephone, a facility or means of interstate commerce, common carrier, or mail; and
- o. Safes or other locked containers and their contents to be searched for the listed items.